IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

JOSEPH STRICKLAND
DEBTOR

<u>DEBTOR'S RESPONSE TO MOTION TO MOTION</u> <u>FOR RELIEF (DK#19)</u>

COMES NOW, the debtor, Joseph Strickland, by and through the his counsel, and files this Response to BancorpSouth Bank and In support of this motion of the Debtor states as follows:

- 1. The Debtor would state that he does not have any equipment from Strickland Survey; and
- 2. The Debtor requests that she be allowed additional time to bring his payments current if necessary, and that the Motion for Relief be denied; and
- 3. The Debtor prays for general relief.

THIS the 19th day of November, 2020.

Respectfully submitted,

JOSEPH STRICKLAND

By: /s/ Edwin Woods, Jr.

EDWIN WOODS, JR. (MB# 8893) BOND BOTES & WOODS, P.C. 5760 I-55 North, Ste 100

CASE NO: 20-02683-NPO

CHAPTER 7

5/60 I-55 North, Ste 100

Jackson MS 39211 Telephone: (601) 353-5000

Facsimile: (601) 372-7140

Email: lwilkinson@bondnbotes.com

CERTIFICATE OF SERVICE

I, Edwin Woods, Jr., attorney for the Debtor, hereby certify that to the extent any party is not served by the Court's CM/ECF system, I have this day mailed postage pre-paid, a true and correct copy of the foregoing Debtor' Response to Motion for Relief of BancorpSouth Bank to Eileen Shaffer, Chapter 7 Trustee, P.O. BOX 1177, Jackson MS 39215, United States Trustee, 501 East Court Street, Suite 6-430, Jackson, MS 39201 and James Renfroe, 648 Lakeland East Drive, Ste A, Flowood, MS 39232 for BancorpSouth Bank, postage prepaid.

This the 19 th day of November 2020.

/s/ Edwin Woods, Jr.
EDWIN WOODS, JR. (MB# 8893)
BOND BOTES & WOODS, P.C.
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Lase 20-02683-NPO
Couthern District of Mississippi
Cackson-3 Divisional Office
Thu Nov 19 15:35:07 CST 2020

Blake Teller

Guaranty Bank & Trust Company c/o Jim F. Spencer, Jr. Watkins & Eager PLLC P.O. Box 650 Jackson, MS 39205-0650 U.S. Bankruptcy Court 501 East Court Street, Suite 2.300 P.O. Box 2448 Jackson, MS 39225-2448

.201 Cherry St 'icksburg, MS 39183-2919 (p) BANCORPSOUTH
BANKRUPTCY DEPARTMENT
P O BOX 4360
TUPELO MS 38803-4360

Brad Henley PO Box 389 Jackson, MS 39205-0389

:itibank
:entralized Bk dept
'o Box 790034
't Louis, MO 63179-0034

David Sessums 1110 Jackson St Vicksburg, MS 39183-2538

Ed Hampton Air & Heat PO Box 820484 Vicksburg, MS 39182-0484

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'icksburg, MS 39180-3802

Guaranty Bank & Trust 210 Hayden St Belzoni, MS 39038-3636 James D. Hobson Jr 114 Maison Rue Vicksburg, MS 39180-5385

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fackson MS 39205-0650

John Bullard 1001 Adams St Ste B Vicksburg, MS 39183-2535

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Mutual Cdt

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'icksburg, MS 39183-3413

Trustmark Bank 1301 Washington St Vicksburg, MS 39180-3267

United States Trustee 501 East Court Street Suite 6-430 Jackson, MS 39201-5022

'arner Parker & Sessum PA .110 Jackson St

'icksburg, MS 39183-2538

World's Foremost Bank Attn: Bankruptcy 4800 Nw 1st St Lincoln, NE 68521-4463 Edwin Woods Jr.
Bond Botes & Woods PC (Byram)
5760 I55 North
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Jackson, MS 39211-2651

ileen N. Shaffer
'.O. Box 1177
'ackson, MS 39215-1177

Joseph Glen Strickland 113 Maison Rue Vicksburg, MS 39180-5380

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

lancorp South 120 South St 'icksburg, MS 39180 20-02683-NPO Dkt 25 Filed 11/19/20 Entered 11/19/20 15:50:49 Page 4 of 4

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

[u] BANCORPSOUTH BANK End of Label Matrix

Mailable recipients 22 Bypassed recipients 1 Total 23